

**Reimbursement of Qualifying Adoption Expenses for Certain Veterans**

VA Form 10-10152

**OMB Control Number: 2900-0860**

**Summary:**

- There are no changes in the anticipated annual number of responses and burden hours.
- There are no revisions to the form.
- VA did not receive comments on the 60-day FRN.

**A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.**

The VA's authority to provide reimbursement of qualifying adoption expenses for certain covered Veterans is found in Section 236 of the Military Construction, Veterans Affairs, and Related Agencies Appropriations Act, 2018, Public Law 115-141 (March 23, 2018) (the "2018 Act") and Section 235 of the Military Construction, Veterans Affairs, and Related Agencies Appropriations Act, 2019, Public Law 115-244 (September 21, 2018) (the "2019 Act"), which renewed and extended in nearly identical form Section 260 of the prior authorizing "2017 Act," Public Law 114-223. VA has eliminated the section in the regulations that specifies an expiration date in order to accommodate Congressional renewal and extension of this authority under subsequent appropriations law.

Veterans with a service-connected disability that results in their inability to procreate without the use of fertility treatments are authorized to receive reimbursement for certain adoption-related expenses for an adoption that is finalized after September 29, 2016 (the date the 2017 Act was enacted). To implement this benefit, VA uses VA Form 10-10152, which requires any Veteran requesting reimbursement of qualifying adoption expenses to submit required documentation and evidence in support of eligibility.

"Covered Veteran" means a Veteran who has a service-connected disability that results in the inability of the Veteran to procreate without the use of fertility treatment. The term "adoption reimbursement" is defined at P. Law 114-223 section 260(a)(4) to mean reimbursement for the adoption-related expenses for an adoption that is finalized after the date of the enactment of the Act under the same terms as apply under the adoption reimbursement program of the Department of Defense, as authorized in Department of Defense Instruction 1341.09, including the reimbursement limits and requirements set forth in such instruction. This law was enacted on September 29, 2016, and funding for the program was authorized through September 30, 2018. DoD Instruction 1341.09, "DoD Adoption Reimbursement Policy" (July 5, 2016) establishes policy, assigns responsibilities within DoD, and provides procedures for the reimbursement of qualifying adoption expenses incurred by members of the Military Services (including document submission requirements) pursuant to 10 U.S.C. 1052. That statute was enacted in 1991 and establishes the parameters of DoD's adoption reimbursement program.

VA is required, under P. Law 114-223 section 260, to apply the requirements outlined in the DoD policy when administering this new benefit, including document submission requirements. Members of

the armed services applying to DoD for adoption reimbursement must complete form DD 2675, which requests personal information on the service member and the adopted child. The service member is required under the DoD policy to submit various types of documents as evidence to support the claim for reimbursement. This includes a copy of the final adoption decree, certificate or court order granting the adoption; proof of citizenship of the adopted child; documentation that the adoption was handled by a qualified adoption agency; and documentation to substantiate reasonable and necessary expenses paid by the service member. In addition, the service member must submit a full English translation of any foreign language document, to include the translator's certification that he or she is competent to translate the foreign language to English and that his or her translation is complete and correct. VA has developed 10-10152, a form which parallels DD 2675, and requires any Veteran requesting reimbursement of qualifying adoption expenses to submit the same types of evidence as required under the DoD policy, as mandated by P. Law 114-223 section 260. In addition, VA will require evidence that the individual applying for adoption reimbursement is a "covered Veteran," meaning a Veteran who has a service-connected disability that results in the inability of the Veteran to procreate without the use of fertility treatment. This is a prerequisite for eligibility for this benefit.

**2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.**

The information will be used solely by VA as part of the process used to determine eligibility for reimbursement of qualifying adoption expenses.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The VA form may be submitted in hardcopy using a form posted on a VA website. Documents submitted under this information collection may be provided in hardcopy or electronically. In the near future, VA may provide an option to complete the form online.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

Either VHA or VBA may have pre-existing documentation that the applicant is a Veteran who has a service-connected disability that results in the inability of the Veteran to procreate without the use of fertility treatment. In such case, VA will not require duplicate evidence. All other evidence that may be required for VA to determine whether the applicant eligibility for reimbursement for qualified adoption expenses is not already in possession of VA and must be submitted by the applicant.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

There will be no direct impact on small businesses or other small entities. The burden falls on the individual Veteran.

**6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

VA would be unable to comply with statutory requirements under P. Law 114-223 section 260 and P. Law 115-141 section 236 to administer the adoption reimbursement benefit under the same terms as apply under the adoption reimbursement program of the Department of Defense, as authorized in Department of Defense Instruction 1341.09, including the reimbursement limits and requirements set forth in such instruction. VA would be unable to determine eligibility for the benefit because the Department would be unable to collect and evaluate whether the applicant is a covered Veteran and whether the applicant incurred qualifying adoption expenses.

**7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.**

There are no such special circumstances.

**8. a. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.**

A 60-Day Federal Register Notice (FRN) for the collection published on Friday, February 20, 2026. The 60-Day FRN citation is 91 FR 8310. VA did not receive public comments on the 60-day FRN.

A 30-Day Federal Register Notice for the collection published on Wednesday, May 6, 2026. The 30-Day FRN citation is 91 FR 24645.

**b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances which preclude consultation every three years with representatives of those from whom information is to be obtained.**

Outside consultation is conducted with the public through 60-day and 30-day Federal Register notices.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payment or gift is provided to respondents.

**10. Describe any assurance of privacy, to the extent permitted by law, provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

Privacy of these records is ensured under the Privacy Act of 1974, applicable exceptions to disclosure under the Freedom of Information Act, HIPAA to the extent medical information is provided, and 38 CFR 1.460 through 1.580.

VA already collects this information and these types of records in two Systems of Records (SORs). The first is Veterans and Beneficiaries Identification and Records Location Subsystem (38VA21), 66 FR 30049. The second SOR is Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records (58VA21/22/28), 77 FR 42594. These systems collect and maintain records relating to Veterans and their beneficiaries and contain identifying information, military information, VA claim numbers, and cross-references to beneficiaries and their identifying information. Information is collected for the purpose of applying, and determining eligibility, for VA benefits.

**11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

While an applicant may be required to submit personal identifying information on both the applicant and the adopted child, there are no questions of a sensitive nature.

**12. Estimate of the hour burden of the collection of information:**

- a. The number of respondents, frequency of responses, annual hour burden, and explanation for each form are reported as follows:**

| <b>VA Form<br/>10-10152</b>                            | <b>No. of<br/>respondents</b> | <b>x No. of<br/>responses</b> | <b>x No. of<br/>hours</b> | <b>=</b> | <b>Number of<br/>Hours</b> |
|--|-------------------------------|-------------------------------|---------------------------|----------|----------------------------|
| Reimbursement<br>of Qualifying<br>Adoption<br>Expenses | 80                            | 1                             | 6.0                       | =        | 480 hours                  |

- b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13.**

This request covers only one form.

**c. Provide estimates of annual cost to respondents for the hour burdens for collections of information. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

VA cannot make assumptions about the population of respondents because of the variability of factors, such as the educational background and wage potential of respondents. Therefore, VHA used general wage data to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean hourly wage is \$32.66 based on the BLS wage code – "00-0000 All Occupations." This information was taken from the following website: <https://data.bls.gov/oes/#/industry/000000>

Legally, respondents may not pay a person or business for assistance in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be \$15,676.80 (480 burden hours x \$32.66 per hour).

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

- a. There are no capital, start-up, operation or maintenance costs.
- b. Cost estimates are not expected to vary widely. The only cost is that for the time of the respondent.
- c. There is no anticipated recordkeeping burden beyond that, which is considered usual and customary.

**14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Estimated annual cost to Federal government: **\$7,000.00**

80 form submissions x 2 hrs per GS-10/5 @ \$43.26/hr = \$6,921.50 ~ \$7,000.00

**15. Explain the reason for any burden hour changes or adjustments reported in items 13 or 14.**

VA does not project any changes since our last submission.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

VA does not intend to publish this data.

**17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

VA will include the expiration date on this form.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.**

There are no exceptions.